PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



### COMPLIANCE EVALUATION INSPECTION

MARATHON OIL COMPANY DETROIT, MI MID 005 506 357

FINAL REFERRAL PACKAGE

### Prepared for

### U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : R05054

EPA Region :

 Site No.
 :
 MID 005 506 357

 Date Prepared
 :
 September 24, 1992

Contract No. : 68-W9-0006

Prepared by : PRC Environmental Management, Inc.

Contractor Project Manager : (Mary Joyce Freibert)

Deb Harrity

Telephone No. : (312) 856-8700 EPA Work Assignment Manager : Allen Wojtas

Telephone No. : (312) 886-6194

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Part I -- SUMMARY

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PART I SUMMARY

### **SUMMARY**

### RELEVANT INFORMATION

Facility:

Marathon Oil Company

1300 South Fort Avenue

Detroit, MI 48217

EPA ID No.:

MID 005 506 357

Contact:

Jeff Bruestle

Phone No.:

(313) 843-9100

Inspectors:

Mary Joyce Freibert, PRC Lead Inspector

Gina L. Gulseth, PRC Inspector

Phone No .:

312/856-8700

### PROJECT BACKGROUND

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05054 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment calls for PRC to conduct compliance evaluation inspections (CEI) of treatment, storage, and disposal (TSD) facilities in Region 5 that import or export hazardous waste.

PRC conducted a CEI at the Marathon Oil Company (Marathon) facility in Detroit, Michigan, on July 29, 1992. This referral package briefly presents PRC's scope of work for the CEI and discusses potential violations identified during the inspection. The referral package contains three parts: Part I presents a summary of PRC's inspection; Part II contains the CEI checklist; and Part III provides supporting evidence for the CEI.

Marathon operations include refining of crude oils. The facility generates wastewater sludge (K051) in liquid and solid states and exports then to Laidlaw Environmental Services, Limited (Laidlaw) (formerly Tricil, Limited), in Corunna, Ontario (MIT 270 019 904). The facility ships the wastewater sludge about six times annually. In 1991, Marathon generated about 120 tons of wastewater sludge, all of which was exported to Laidlaw.

### POTENTIAL VIOLATIONS

PRC inspected the Marathon facility on July 29, 1992. The inspection included records review and interviews with facility personnel. At the time of inspection, Marathon

representatives informed PRC that the facility is operating as a large-quantity generator of hazardous waste. Part III includes supporting evidence for this status. During the inspection, PRC noted a potential violation of the Code of Federal Regulations (40 CFR). This potential violation is listed below.

1. Potential Violation -- [40 CFR 262.53(c)]. The facility did not submit a renotification indicating a change to its original notification for exporting wastewater sludge. In 1992, the facility exported wastewater sludge as a K051 waste only; however, the notification of intent to export, dated January 27, 1992, and the EPA Acknowledgement of Consent to export, dated March 6, 1992, list K051 and F037 waste codes.

PART II
COMPLIANCE EVALUATION INSPECTION CHECKLIST

### TSD-RCRA IMPORTER/EXPORTER INSPECTION REPORT

Name Marathon Oil	Company EPA	ID No. MID 005 506 357
Location Address:	1300 South Fort Avenue  Detroit, MI 48217	
Mailing Address:	1300 South Fort Avenue  Detroit, MI 48217	
Ownership: Marath	on Oil Company	County: Wayne
Contact: Jeff Bi	ruestle	Telephone: (313) 843-9100
Facility Type: 2	1 = Importer 2 = Exporter 3 = Importer and Exporter	
Person(s) Interviewed	Title:	Telephone:
Jeff Bruestle	Advanced Environmental Engineer	(313) 843-9100
Brian Van der Hoff	Environmental Engineer	(313) 843-9100
Inspectors:	Agency:	Telephone:
Mary Joyce Freibert	PRC Lead Inspector, EPA Contractor	(312) 856-8700
Gina L. Gulseth	PRC Inspector, EPA Contractor	(312) 856-8700
Date/Time of Inspect	ion: 7/29/92 / 10:45 a.m.	

GEN	ERAL MANIFEST REQUIREMENTS	OIZ	DE	D.T.A
		<u>OK</u>	<u>DF</u>	<u>NA</u>
(A)	IMPORTER REQUIREMENTS:			
(1)	Has the importer of hazardous waste received a manifest OMB control number 2050-0039 on EPA Form 8700-22, and if necessary, EPA Form 8700-22A?  40 CFR 262.60(b) and 262.20(a)	*	.=	<u>X</u>
	Does the manifest include the following:			
	(a) Name and address of the foreign generator, and the name, address, and EPA ID number of the importer?  40 CFR 262.60(b)(1)	_	_	_X_
	(b) Signatures of both the U.S. importer or his agent, and the initial transporter, and date on the certification? 40 CFR 262.60(b)(2)	# - # # # # # # # # # # # # # # # # # #	_	<u>X</u>
(2)	Has the importer obtained the manifest form from the consignment state if the state supplied the manifest and required its use (Note: if the state did not supply the manifest form, then the manifest may be obtained from any source)? 40 CFR 262.60(c)	_		_X_
(B)	IMPORTER REQUIREMENTS:		٠	
(1)	Has the Importer notified the Regional Administrator/MDNR Regional Director of receipt of hazardous waste from a foreign source?  40 CFR 264/265.12(a)	_	-	<u>X</u>
(2)	If so, was the notification in writing, and sent four weeks in advance of the date the waste was expected to arrive at the facility (Note: notice of subsequent shipments of the same waste is not required)?  40 CFR 264/265.12(a)	_	_	X
(C)	EXPORTER REQUIREMENTS:			
(1)	Has the exporter submitted a renotification, and obtained an EPA Acknowledgement of Consent, if any changes have been made to the original notification?  40 CFR 262.53(c)	-	X	_
(2)	Has the exporter submitted manifests as required in 40 CFR 262.20 through 262.23? 40 CFR 262.54	X		
	1 ×		-	_
	Does the manifest contain the following information:			
	(a) Name and site address of the consignee?  40 CFR 262.54(a)	<u>X</u>	_	_

			<u>OK</u>	<u>DF</u>	<u>NA</u>
	(b)	Name and site address of any alternate consignee? 40 CFR 262.54(b)	X	, ************************************	*******
	(c)	The point of departure from the United States identified in Special Handling Instructions? 40 CFR 262.54(c)	X	<b>13457</b>	*******
	(d)	The following sentence in Item 16 of the Uniform Hazardous Waste manifest form: "and conforms to the terms of the attached EPA Acknowledgement of Consent"?  40 CFR 262.54(d)	<u>X</u>		_
(3)	expor manif	the exporter obtained the manifest form from the ter's State (Note: if the State does not supply the fest, it can be obtained from any source)?  FR 262.54(e)	<u>X</u>	_	
(4)	consi	the exporter have a signed copy of the manifest from the gnee confirming delivery? FR 262.54(f)	<u>X</u>		
(5)	If a s	shipment could not be delivered to the designated or tate consignee, did the exporter do the following:			
	(a)	Renotify EPA of changes in the original notification, and obtain an EPA Acknowledgement of Consent prior to delivery?, or 40 CFR 262.54(g)(1)			
	(b)	Instruct the transporter to return the waste to the exporter or another facility in the United States?, and 40 CFR 262.54(g)(2)		WYCH	<u>X</u>
	(c)	Instruct the transporter to revise the manifest in accordance with exporter instructions?  40 CFR 262.54(g)(3)	******	_	<u>X</u>
(6)	Has Ackn the ex the A	the exporter received a copy of the EPA owledgement of Consent (AOC) before shipment, and has exporter shipped waste only within 12 months of receiving OC?	<u>X</u>		
(7)	manii	the exporter attached a copy of the EPA AOC to the fest accompanying shipment? FR 262.54(h)			
(0)	T¥ 4		X		<del></del>
(8)	copy at the	he exporter provided the transporter with an additional of the manifest for delivery to the U.S. Customs Official point the hazardous waste leaves the United States? FR 262.54(i)	<u>X</u>		_

<u>KEC</u>	ORDKEEPING REQUIREMENTS:			
		<u>OK</u>	<u>DF</u>	<u>NA</u>
(A)	IMPORTER REQUIREMENTS:		÷	
(1)	Has the importer retained at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years?  40 CFR 264/265.71(b)(5)		_	<u>_X</u>
(B)	EXPORTER REQUIREMENTS:*			
(1)	Has the exporter kept a copy of each notification of intent to export for three years from the date waste was accepted by the initial transporter?  40 cFR 262.57(a)(1)	<u>X**</u>	· <u></u>	_
(2)	Has the exporter kept a copy of each EPA Acknowledgement of Consent for three years from the date waste was accepted by the initial transporter?  40 CFR 262.57(a)(2)	<u>X**</u>	, <u>-</u>	
(3)	Has the exporter kept a copy of each Confirmation of Delivery for three years from the date waste was accepted by the initial transporter?  40 CFR 262.57(a)(3)	<u>X**</u>	_	
(4)	Has the exporter kept a copy of each annual report for three years from the date waste was accepted by the initial transporter?  40 CFR 262.57(a)(4)	X**		

<sup>\*</sup>Note: The periods of records retention referred to in this section are extended automatically during the course of any unresolved enforcement action.

<sup>\*\*</sup>The facility has been exporting wastewater sludge to Laidlaw Environmental Services, Limited, since 1991; the facility had the appropriate records for 1991 and 1992.

### PART III

### SUPPORTING EVIDENCE

- **EPA LETTER REGARDING TSD NOTIFICATION**
- NOTIFICATION OF INTENT TO EXPORT EPA ACKNOWLEDGEMENT OF CONSENT MANIFESTS LISTING K051 WASTE CODE PHOTOCOPIES OF FIELD LOGBOOK

**EPA LETTER REGARDING TSD NOTIFICATION** 



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V 230 SOUTH DEARBORN ST CHICAGO, ILLINOIS 60604

> REPLY TO ATTENTION OF: RCRA ACTIVITIES

BLUM SYDNEY CIVIC AFFAIR COUPD MARATHON OIL COMPANY 1300 S FORT DETROIT

HID005506357

FACILITY: 1300 S FORT

ΜI 48217

LOCATION: DETROIT ID NO. :

MI 48217

RE: TSD Notification without

Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with . 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

> RCRA ACTIVITIES P. O. Box A3587 Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

NOTIFICATION OF INTENT TO EXPORT



1300 South Fort Street Detroit, Michigan 48217-1294 Telephone 313/843-9100

Certified Mail Return Receipt #P 507 787 685

January 27, 1992

U.S. Environmental Protection Agency Office of International Activities (A-106) 401 M. Street S.W. Washington, D.C. 20460

7 J. Buesto

RE: Notification of Intent to Export

To Whom It May Concern:

The attached notification forms are being submitted by Marathon Oil Company pursuant to the requirements of 40 CFR 262.53.

Please contact me at 313-843-9100 if you have any questions or require additional information.

Sincerely,

Jeffery L. Bruestle

Advanced Environmental Engineer

JLB/sjb Attachments

# Title 40, CFR, Part 262, Subpart E, Section 262.53 INTERNATIONAL SHIPMENTS

Date: 1-27-92	
Office of International Activities (A-106) E.P.A., 401 M. Street S.W. Washington, D.C. 20460	
Attention: Notification to Export	
Our facility (exporter) name: Marathon Oil Compar Address: 1300 South Fort Street, Detroit, MI 48217 Phone: (313)843-9100 E.P.A. #: MID 005506357	ny 7
intends to use (Consignee) name: Laidlaw Environment:	al Services (Sarnia) Ltd.
Address: RR #1 Telfer Side Road, Corunna, Ontario P. E.P.A. I.D. #: MIT 270019904  to dispose of the following hazardous waste for the 12	3
on the date that Canada expresses no objection. The w	a month period beginning vaste involved is:
Description EPA Hazardous DOT Shipping of Waste No. Name	Class (IIN/NA)
Treatment Sludge F037 RQ Hazardous Waste Liquid N.O.S.(KO	ORME NA 9189
Frequency: 8 x 15 tonnes shipment(s) per (volume & units)	<pre>year (day/week/quarter/year)</pre>
Estimated total quantity of hazardous waste shipped for 120 tonnes	r the 12-month period is.
	F0.200 23.
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)	,
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia	Ontario
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City	Ontario Province
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia	Ontario
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City The point of departure from U.S. will be: Pt. Huron	Ontario Province Michigan State
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City The point of departure from U.S. will be: Pt. Huron City  Each shipment of hazardous waste will be transported by Services Ltd. R.R. #1 Telfer Side Rd., Corunna, Ontari EPA transporter No.: MIT 270019904  Via: Highway in Tank T	Ontario Province Michigan State  Y: Laidlaw Environmental o, NON 1GO
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City The point of departure from U.S. will be: Pt. Huron City  Each shipment of hazardous waste will be transported by Services Ltd. R.R. #1 Telfer Side Rd., Corunna, Ontari EPA transporter No.: MIT 270019904  Via: Highway in Tank T	Ontario Province Michigan State  Y: Laidlaw Environmental o, NON 1GO
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(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City The point of departure from U.S. will be: Pt. Huron City  Each shipment of hazardous waste will be transported by Services Ltd. R.R. #1 Telfer Side Rd., Corunna, Ontari EPA transporter No.: MIT 270019904  Via: Highway in Tank Tonk To (Drums/Boz (Mode/Air/Highway/Rail/Water) (Drums/Boz (Drums/Boz (Eg: IXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	Ontario Province Michigan State  y: Laidlaw Environmental o. NON 1GO  rucks es/Tank/Bulk) owing manner: s to the appended f Subject Waste
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)  The point of entry into Canada will be: Sarnia City The point of departure from U.S. will be: Pt. Huron City  Each shipment of hazardous waste will be transported by Services Ltd. R.R. #1 Telfer Side Rd., Corunna, Ontari EPA transporter No.: MIT 270019904  Via: Highway in Tank Tonk To (Drums/Boz (Mode/Air/Highway/Rail/Water) (Drums/Boz (Drums/Boz (Eg: IXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	Ontario Province Michigan State  Y: Laidlaw Environmental o. NON 1GO  rucks es/Tank/Bulk) owing manner: s to the appended f Subject Waste  vision Manager (Date)

0265K/3

### SCHEDULE "A"

This attached Schedule forms part of the acknowledgement of generator registration for the facility and site identified by Generator Registration Number MID005506357, dated at Toronto.

DEC 21 1990

	Waste Stream	Waste Class
1.	Oil/water separator sludge	251H
2.	Solid waste oil/water separator sludge	251H

Waste Management Branch Reviewer:

**EPA ACKNOWLEDGEMENT OF CONSENT** 



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 6, 1992

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

EPA Notice No.: 149/92

MR. LARRY M. ECHELBERGER MARATHON OIL COMPANY 1300 SOUTH FORT STREET DETROIT, MI 48217 EPA ID No.: MID005506357

Dear MR. ECHELBERGER:

This is to acknowledge receipt of your notice, dated January 27, 1992, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste(s) as specified in your notice:

### Waste Stream No.: 1

Waste Description: WASTEWATER TREATMENT SLUDGE. EPA Waste Code: K051,F037. DOT Shipping Name: HAZARDOUS WASTE, LIQUID, NOS; DOT Hazard Class: ORM-E; DOT I.D. No.: NA9189. Total Volume to be Exported: 120 TONS. Estimated Frequency: 8 loads per YEAR.

### Waste Stream No.: 2

Waste Description: WASTEWATER TREATMENT SLUDGE. EPA Waste Code: K051,F037. DOT Shipping Name: HAZARDOUS WASTE, SOLID, NOS; DOT Hazard Class: ORM-E; DOT I.D. No.: NA9189. Total Volume to be Exported: 495 TONS. Estimated Frequency: 33 loads per YEAR.

You may ship these wastes to the following consignee:

LAIDLAW ENVIRONMENTAL SERVICES (SARNIA)
RR#1
CORUNNA, ONTARIO
CANADA NON 1G0
EPA ID No.: MIT270019904

Shipments may occur during the period from February 19, 1992 to February 18, 1993.

You are also reminded of the following special RCRA requirements for export shipments of hazardous waste. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

- 1. If the major terms of the original notice of intent to export on which this consent is based should change, you must renotify EPA. Please send your renotification to: EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, D.C. 20460, with "ATTENTION: NOTIFICATION TO EXPORT" prominently displayed on the front of the envelope. (262.53(c))
- 2. The Uniform Hazardous Waste Manifest Form for each shipment must identify the point of departure from the United States in Item 15, Special Handling Instructions. (262.54(c))
- 3. The following statement must be added to the end of the first sentence of the certification set forth in Item 16 of the Uniform Hazardous Waste Manifest Form: "and conforms to the terms of the attached EPA Acknowledgment of Consent". (262.54(d))
- 4. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (262.54(h))
- 5. You must provide the waste transporter with an additional copy of the U.S. hazardous waste manifest accompanying the shipment for delivery to a U.S. Customs official at the point the hazardous waste leaves the United States in accordance with 263.20(g)(4). (262.54(i)).
- 6. You must file an exception report with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee

that the hazardous waste was received; or if the waste is returned to the United States. (262.55).

You must file an annual report by March 1 of each year with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Ms. Lisa Warner, EPA Office of Waste Programs Enforcement (Phone 202/260-9316) or to Mr. Jim Vincent, EPA National Enforcement Investigations Center (Phone 303/236-5120).

Sincerely,

Jung Janoch Mary Jean Osborne, Chief

Policy Analysis and Coordination Section

RCRA Enforcement Division (OS-520)

cc: Jim Vincent, EPA/NEIC

MANIFESTS LISTING K051 WASTE CODE

### MICHIGAN DEPARTMENT OF NATURAL RESOURCES

## DO NOT WRITE IN THIS SPACE

TT. 🗆 DIS. 🗇 REJ. 🗀 PR. 🗆

Failure to file is punished user section 289.548 MCL or Section 10 of Act 136. PA. 1989,

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# SYST N MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYST CENTER AT 1-800-424-8802 24 HOURS PER DAY.

	1	MICHIGAN DEPARTMENT					una le l			
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GENERATOR 2nd COPY

PR 5110 Rev. 9/88



### MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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1979 as amended and Act 136 PA. 1989.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

OMB No. 2050-0039 Expires 9-30-9

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# MICHIGAN DEPARTMENT OF NATURAL RESOURCES

VICHIGAN AT 1:800.202.4706 OR OUT OF STATE AT 517:373-760 AND THE NATIONAL RESPONSE

DO NOT WRITE IN THIS SPACE REJ. D PR D DIS. T

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

PR 5110 Rev. 9/88

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# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. DIS. B REJ. PR. D

Required under authority of Act 64 Pz., 1979, as amended and Act 138 PA. 1969.

Fallure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

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1 3	WASTE MANIFEST DE LA COMPANIE DE LA		ment No.	law.	t required by Fede
	Marathon UTT Company			tate Manifest	O O O 7
	1300 South Fort Street			tate Generator	910
4.	Generator Phone (48217 ) (313) 843-9100				
) D.	Transporter 1 Company Name 6.	US EPA ID Numi		state Transport	
7.	Transporter 2 Company Name 8.	US EPAID Num	THE RESERVE THE PARTY OF THE PA	ransporter's Pr	DESIGNATION AND ADDRESS OF THE PARTY OF THE
				ansporter's Ph	
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	Corunna, Off 108-160	UTI2 7 6 6 1 9	THE PARTY AND TH	acility's Phone	
11	1. US DOT Description (including Proper Shipping Name, Ha		12 Containers		14 1. Waste
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	Additional Descriptions for Materials Listed Above		KH	andling Codes	for Wastes 2/
	This waste is subject to the land disp	iosel restricts		sted Above	al al
	in 40CFR 26841 and 26843 for 1051 non				10/
	Emergency response guide (31 attached)				(C)
11	5. Special Handling Instructions and Additional Information	- Verson and the			10/
) ffton		FORE OF Gepar	cure in a	U.S. W(1)	be Port Horse
16	6. GENERATOR'S CERTIFICATION: Unereby declare that the contents of this	s consignment are fully and	accurately describ	ed above by	
18.4	proper shipping name and are classified, packed, marked, and labeled, an according to applicable international and national government regulations.	d are in all respects in prop	er condition for tra	nsport by highway	attached
13.3	If am a large quantity generator, I certify that I have a program in pla	ce to reduce the volume a	nd toxicity of was	te generated to t	he degree I have determ
1	to be economically practicable and that I have selected the practicable present and future threat to human health and the environment; OR; generation and select the best waste management method that is	if I am a small quantity of	enerator I have m	ade a good faith	effort to minimize my w
1	13 1 40 10 10 10 10 10 10 10 10 10 10 10 10 10	a diameter in the and the	it i call allulu.		> Date
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7	O. Facility Owner or Operator: Certification of receipt of hazard Item 19.	ous materials covered l	by this manifes	t except as note	ed in Date
Y   30	O. Facility Owner or Operator: Certification of receipt of hazard ltem 19.  Printed/Typed Name	ous materials covered l	by this manifes	t except as note	

PHOTOCOPIES OF FIELD LOGBOOK

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Michigan Refining Division



1300 South Fort Street Detroit, Michigan 48217-1294 Telephone 313/843-9100

February 5, 1988

Ms. Shirlee Brauer
U. S. EPA Region V
RCRA Enforcement Section
5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Ms. Brauer:

Pursuant to our telephone conversation yesterday, I have enclosed the signed certification.

In reviewing the situation, our Findlay Headquarters mailed you a signed certification in May, 1987 and it was assumed by the Detroit Refinery that what they sent to you was sufficient. Please accept our apology for any inconvenience this may have caused your department.

Sincerely,

Sydney Blum

Givic Affairs Coordinator

SB:jmm attachment

All responses should be sent to Ms. Shirlee Brauer, U.S. EPA Region V, RCRA Enforcement Section, 5HE-12, 230 South Dearborn Street, Chicago, Illinois 60604. Questions may be directed to the RCRA/Superfund Hotline at (800) 424-9346 or to either Ms. Brauer at (312) 886-4591 or Ms. Laura Lodisio at (312) 886-7090.

Sincerely,

Basil & Constantelos, Director Waste Management Division

Enclosure

After reviewing the information provided, I certify that I am not a marketer or burner of waste-as-fuel and that I do not generate hazardous waste used to produce a fuel. Therefore, I am not subject to the regulations finalized on November 29, 1985, which are codified in 40 CFR Part 266, Subparts D and E. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title

Date Signed

Sydney Blum
Civic Affairs Coordinator

February 5, 1988

MAR A O PORT

5HR-13

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Marathon Petroleum Co. 1300 South Fort Detroit, Michigan 48217

Re: Marathon Petroleum Co.

Dear Sir or Madam:

The purpose of this letter is to inform you of the November 7, 1990, date of the expiration of the national capacity variance for petroleum refinery wastes, K048-K052. As you are aware under the Third Third rule, EPA granted an additional three-month national capacity variance for these wastes (55  $\underline{FR}$  22641, June 1, 1990). The variance expires on November 7, 1990.

As of November 8, 1990, you, as the generator of these wastes, must treat the KO48-KO52 wastes to BDAT standards prior to land disposal, <u>unless</u> one of these three situations exists:

- 1. You have received final approval for a case-by-case extension (RCRA Section 3004(h)(3) and 40 CFR 268.5) as published in the <u>Federal Register</u>, or
- 2. You have received final approval for a "no-migration" variance (40 CFR 268.6) as published in the <u>Federal Register</u>, or
- 3. You or the treatment facility has received a treatability variance (40 CFR 268.44) for the particular waste stream(s).

The Agency anticipates that it will not issue any final decisions on any petitions for variances or extensions prior to November 8, 1990. During the period of the national capacity variance, you should have been exploring and implementing alternatives to the land disposal of untreated KO48-KO52 wastes.

The Agency is committed to carrying out the mandate established by Congress in RCRA Section 3004 of the Hazardous and Solid Waste Amendments of 1984. We will be conducting inspections and taking subsequent enforcement actions appropriate to the nature of the violations relating to the Land Disposal

Restrictions regulations soon after the November 8, 1990, date. We strongly advise you to take any necessary steps to be in compliance with these important requirements on the effective date.

Sincerely yours,

ORIGINAL SIGNED BY/ KARL BREMER

William E. Muno Acting Associate Director Office of RCRA

cc: Alan Howard

Michigan Department of Natural Resources

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#### INSPECTION AND ENFORCEMENT REVIEW/STATUS

TO 11 MID 005 506 35?

FACILITY NAME <u>Flavorhon Petroleum Co.</u>

LOCATION <u>Detroit</u> MI

COMPLIANCE STATUS: IN OUT VIOLATION CLASS: I II III

REVIEWER:
DATE:

### INSPECTION REVIEW

ACTION ITEM	STRT DATE	END DATE	RPT COMP	STAT CODE	RESP NGCY	RESP PERS	COMM	FREE FLDS	TYPE INSP	PART AGCY	LINK
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#### **ENFORCEMENT ACTIONS**

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NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
THOMAS J. FLUHARTY
HEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

David F. Hales, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management
505 W. Main
Northville, MI 48167

December 20, 1988

In Compliante

Marathon Petroleum Company 1300 S. Fort Street Detroit, MI 48217-1294 Attn: Mr. Jeffrey L. Bruestle

RE: MID005506357 V

Dear Mr. Bruestle:

On November 30, 1988, an inspection was conducted at your facility located at 1300 S. Fort Street, Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

I have determined that your facility has no deficiencies of the requirements in the areas reviewed during that inspection.

Thank you for your cooperation during my visit.

Sincerely,

Faye Mitchell

Environmental Quality Analyst

FM:cm

cc: B. Okwumabua

Enclosure

R1026-1 5/85

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

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## RCRA LAND DISPOSAL RESTRICTION INSPECTION

#### GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A	TO WY A	7r 7r	
A.	BUA	1 Ire	eatability Group - Treatment Standards Identification
	1.		lvent Wastes: Does the generator correctly determine the opriate treatability group of the waste?
786 18	*32	8 <b>4</b> 23	Yes No NA
		If yo	es, check the appropriate treatability group.
<u> </u>	8 8		Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing spent methylene chloride All other spent solvent wastes
	2.		fornia List Wastes: Does the generator correctly determine appropriate treatment standard of the waste?
		<b>a.</b>	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
· .			Yes No NA
	80		If yes, specify the method:
	ź	b.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?
		20	Yes No NA
	(3		If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

	3.	First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
		Yes No NA
		If yes, check the appropriate treatability group.
		Wastewater (less than 1% TOC by weight and less than 1% filterable solids) Nonwastewaters
		List the waste code and check the correct treatment standard group.
		Waste Code Wastewater Nonwastewater
		D008
		K052/51 (not effective unital November 1990)
B.	Was	ste Analysis
	1.	F-Solvent Wastes
		a. Does the generator determine whether the F-solvent waste exceeds treatment standards?
		Yes No NA
	,	How was this determination made?
		- Knowledge of waste
		YesNo
		If yes, is any supporting data available for review? Describe how this is adequate.
b.	,	- TCLP Yes No
		If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

	b.	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?
		Yes No NA
		If yes, specify the waste stream:
	c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
		Yes No NA
20	d.	How does the generator test F-solvent waste when a process or waste stream changes?
2.	Cali	fornia List Wastes
	a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846? Itquil   from the fire Flower
	8	Yes No NA
	b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
		Yes No NA
	ħ	What type of absorbent is used? Check the types of waste to which absorbent is added.
	139	Liquid hazardous waste having a pH less than or equal to 2
		Liquid hazardous waste containing metals
		Liquid hazardous waste containing free cyanides
	c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
		- Knowledge of wastes
		Yes No NA
	<del>(</del> 6)	

	-	Testing	Yes	,	A.T.a.		76. T A	
			Yes	•	140	**************************************	NA	
		If yes, list	test method	used:	dentions	nandatiikkiikiikiikiikooleeniaa kiriiliikiik	OPENSONAL AND STREET STREET STREET	
₫.			ator determin cyanide and					T
			Yes	(1)	_ No	<del></del>	. NA	
	•	levels that	t test method t exceeded pr 1500 mg/J	ohibitio	n levels:	TUTA	1 works	v(Sh/V)
e.		es the generations that	ator dilute th	e waste	as a subs	titute fo	or adequate	:
			Yes	V	No	+	NA	
			163	,	4 1 67	***************************************	_ +	
Firs	st Thi	rd Wastes:		<del></del>		<del>Vellades es sous es des</del>		
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Firs a.	Doc	s the gener	ator correctly	determ	ine the a	ppropria	te treatme	nt
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<b>a.</b>	Doc star Not App	es the general dard of the steet. The trependix D.	ator correctly waste?  Yes  atment standa	determ	No first thin  her the Fi	ppropria d waste	te treatme NA s are given	in
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<b>a.</b>	Not App	te: The trependix D.  tes the generation of the desired trependix D.  tes the generation of the desired trependix desire	ator correctly waste?  Yes  atment standa  ator determindards upon ge  Yes  the waste stre	determ	No first thin ner the Fi n? No	ppropria d waste	te treatme.  NA s are given d waste ex  Soft ham	in ceeds mer

•		- TCLP
		Yes No NA
		- Total Constituent Analysis
		Yes No NA
		Provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
		Yes No NA
	d.	How does the generator test the waste when a process or waste stream changes?
Ma	nagen	nen <b>t</b>
1.	On-	-Site Management
		restrict waste or waste that exceeds the treatment standards ated, stored, or disposed on-site?
		Yes No
-	If :	yes, the TSD Checklist must be completed.
2.	Of	f-Site Management
p.	a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
		Yes No
1	b.	Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
		Yes No
:		

c.	Does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manisest number Yes No
	Waste analysis data, if available Yes No
	Identify off-site treatment or storage facilities: Municon  DISpense. Delleville, M.T.
d.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
	Yes No
6.	Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
	Yes No
Ĺ.	Does notification contain the following?
1	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards . Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets treatment standards Yes No
•	Identify off-site land disposal facilities:
<b>g.</b>	Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?
	Yes No NA
h.	If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?
	Yes No

i.	If yes, does the notification contain the following information?
	EPA Hazardous waste number Yes No
9	The corresponding treatment standards and all applicable prohibitions Yes No
	Manifest number Yes No
9 <u>9</u> 10	Waste analysis data, if available Yes No
a.	Date the waste is subject to the prohibitions Yes No
<b>j.</b>	Does the generator retain copies of all notices and certifications for a period of 5 years?  Ves  OS of MU. 1968
D. \Demons	tration and Certification "Soft Hammer" Wastes
<b>a.</b>	Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?  Yes  No
<b>b.</b>	Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:
* ************************************	A list of facilities and facility officials contacted?  Yes No
	Addresses Yes No
	Telephone Numbers Yes No
9 X g	Contact dates Yes No
	Attach a copy of the demonstration and certification
° с.	If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?  YesNo
	If yes, attach a copy of written discussion.

				o <sub>ne (Co</sub> nnecession con contract and to the
Did the	generator send a copy o	f its demor e first ship	nstration and coment of waste	ertification ?
•	Yes	No		
		ification w	ith each subsec	quent
	Yes	No		
Does th	ne generator provide the ing facility with each shi	following pment of v	notification to vaste?	the
(i)	EPA Hazardous wast	e number	Yes	No.
(ii)	Manisest number		Yes	No
(iii)	Waste analysis data, if available		Yes.	N (
Does the	he generator retain copic cations for a period of 5	es of all no years?	tices, demonstr	ations, and
	Yes	No.		•
ers. furn	aces, distillation units, v	vastewater	ocesses	
e treatme	ent residuals generated f A 264/265?	rom units c	or processes exe	mpt
	Did the to the r  Does the shipment of the receiving the shipment of the receiving the shipment of the shipmen	Did the generator send a copy of to the receiving facility with the Yes  Does the generator provide cert shipment of wastes? Yes  Does the generator provide the receiving facility with each shi  (i) EPA Hazardous wast  (ii) Manifest number  (iii) Waste analysis data, if available  Does the generator retain copie certifications for a period of 5 Yes  nt Using RCRA 264/265 Exempt ters, furnaces, distillation units, went tanks, elementary neutralizations treatment residuals generated for the stanks are treatment residuals generated for the stanks are treatment residuals generated for the stanks are treatment are siduals generated for the stanks are treatment residuals generated for the stanks a	Did the generator send a copy of its demons to the receiving facility with the first ship	Does the generator provide certification with each subsets shipment of wastes?  Yes No  Does the generator provide the following notification to receiving facility with each shipment of waste?  (i) EPA Hazardous waste number Yes  (ii) Manifest number Yes  (iii) Waste analysis data, if available Yes  Does the generator retain copies of all notices, demonstr certifications for a period of 5 years?  Yes No  nt Using RCRA 264/265 Exempt Units or Processes exert tanks, elementary neutralization, etc.)  e treatment residuals generated from units or processes exerts.

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jeff Bruestle Marathon Oil Company 1300 South Fort Avenue Detroit, Michigan 48217

Re: RCRA Compliance Inspection

Marathon Oil Company

EPA ID No.: MID 005 506 357

Dear Mr. Bruestle:

On July 29, 1992, your facility located in Detroit, Michigan was inspected by the United States Environmental Protection Agency's (U.S. EPA) representatives. The purpose of the inspection was to evaluate compliance with the requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the import or export of hazardous waste. A copy of the inspection is enclosed for your reference.

Based on information provided by facility personnel and a review of records at the time of the investigation, it was determined that the facility exports hazardous waste. It was also determined that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations.

If you have any questions and/or concerns regarding this matter, please contact Janet Haff of my staff at (312) 353-7923.

Sincerely yours, ORIGINAL SIGNED EN JOSEPH M. BOYLE

Joseph M. Boyle, Chief RCRA Enforcement Branch

Enclosure

cc: JoAnn Merrick, MDNR-Lansing

bcc: Allen Wojtas, U.S. EPA

J.HAFF:ev:01/12/93:DISK #: FILE:jbryestle

·						***			
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TYP.	AUTH	TES	TES	TES	EPS	EPS	BRANCH	ASSOC.	DIVISION
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### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5

## 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE AFTENTION OF

5HE-12

1 FEB 1988

Marathon Petroleum Co. (Refining) 1300 S. Fort St. Detroit, MI 48217

Re: Second Letter of Warning Waste-As-Fuel Notification

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) has not received your response to a Letter of Warning issued on April 17, 1987; a copy of this letter is enclosed. The letter required that you review all waste management activities conducted at your facility and, if applicable, submit a notification to the U.S. EPA of hazardous waste or used oil activities. If you are not a generator, marketer or burner of hazardous waste or used oil requiring notification, you were required to submit a signed certification to that effect. To date, neither response has been received from you by the U.S. EPA.

Please review the enclosed letter, and within thirty (30) days of this letter's date, submit either a completed Notification or signed certification. Be advised that Notification of hazardous waste and used oil activities is required pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA). Failure to submit such notification, if required, is a violation of RCRA and may subject you to further enforcement action by this agency, including the assessment of a civil penalty of up to \$25,000 per day of violation.

All responses should be sent to Ms. Shirlee Brauer, U.S. EPA, Region V, RCRA Enforcement Section (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604. Questions may be directed to Ms. Brauer at (312) 886-4591 or Ms. Laura Lodisio at (312) 886-7090. If you need additional Notification forms and instructions, please contact the U.S. EPA, Region V, Identification Number Hotline at (312) 886-4001.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosure

'ATURAL RESOURCES COMMISSION

JACOB A. HOEFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
MOMENTA MANNERS BUILDING
Ronald Skoog, Director
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

October 31, 1983

Mr. Sydney Blum Civic Affairs Coordinator Marathon Oil Company 1300 South Fort Street Detroit, Michigan 48217

Re: MID 005506357

Dear Mr. Blum:

Thank you for your letters of October 18 and October 27, 1983. Your responses appear to address the items of my October 19 letter quite satisfactorily. Thank you for your prompt and cooperative resolution of these violations.

Sincerely,

Susan Norton

Sum Nortas)

Water Quality Specialist Compliance Section

Hazardous Waste Division

SN/sc

cc: Hazardous Waste Division, Lansing (3)



1300 South Fort Street Detroit, Michigan 48217-1294 Telephone 313/843-9100

October 27, 1983

RECEIVED

Ms. Susan Norton
Water Quality Specialist
Compliance Section
Department of Natural Resources
9311 Groh Road
Grosse Ile, MI 48138

OCT 3 1 1983

WATER QUALITY DIV.

Dear Ms. Norton:

I received your letter dated October 19, 1983, reviewing the visit by you and Jim Scott concerning compliance with RCRA Subtitle "C" on September 26 and my follow-up visit to you on September 29. I was on vacation until October 25 so I could not respond to it until today.

I appreciate your comments about our generally high level of compliance and am responding to the questions you raised.

- 1. The generator second copy of Manifest MI 161635 was, in fact, missing. Chem-Met, our disposer, was called and furnished us a copy of the manifest, noting correct disposal of 7,000 gallons of API separator sludge (K051) on August 12, 1983. A copy of that manifest was mailed to you on October 18 and 1 trust that the action taken meets your requirement.
- Enclosed is a list of home addresses and home and office phone numbers for all individuals qualified to act as emergency coordinator. We did have the home telephone numbers but not the addresses and this information will be included in our Emergency Control Plan.

If you desire anything further, please let me know.

Sincerely yours,

Sydney Blum

Civic Attairs Coordinator

vh att.

## EMERGENCY RESPONSE INDIVIDUALS

<u>Name</u>	<u>Title</u>	Home Address	Home Phone (313)	Office Phone (313) 843-9100
R. L. Barrett	Division Manager	23303 Parke Lane Grosse Ile, MI 48138	675-0628	Ext. 351
Sydney Blum	Civic Affairs Coordinator	13117 Ludlow Huntington Woods, MI 48070	541-3941	Ext. 375
R. W. Campbell	Engineering Manager	<b>26</b> 5 Westwood Dr. Birmingham, MI 48009	540-8648	Ext. 311
R. H. Church	Maintenance Manager	35564 Heritage Lane Farmington, MI 48024	478-6522	Ext. 405
M. R. Doran	Products Control Manager	9399 Marlboro Allen Park, Ml 48101	383-4278	Ext. 261
J. R. Kassarjian	Technical Service Manager	2475 Canyon Ypsilanti, Ml 48197	1-434-3094	Ext. 332
L. H. Varner	Operations Manager	17173 Goldwin Southfield, MI 48075	552-0342	Ext. 371

925 8 Harry +

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909 HEWASCKK WANNESK THECKE Ronald Skoog, Director

Hazardous Waste Division 9311 Groh Road Grosse Ile, Michigan 48138

October 19, 1983

CERTIFIED MAIL

Mr. Sydney Blum Civic Affairs Coordinator Marathon Oil Company 1300 South Fort Street Detroit, Michigan 48217

Petroleum

Re: MID 005506357

Dear Mr. Blum:

On September 26, 1983, I visited the Detroit Marathon facility to determine compliance with the provisions of Subtitle C of the Resource Conservation and Recovery Act of 1976 (RCRA), as amended. In follow-up, you met with me at the Grosse Ile DNR office on September 29 for further discussion of Marathon's emergency response plans. The facility was reviewed as a generator, and was found to be maintaining a generally high level of compliance. Such violations as were noted and were not resolved during our meeting are discussed below:

- In review of the waste manifests, the Generator Second Copy for manifest MI 161635 could not be located; further, no weight or volume was listed for this manifest. Please advise me of the status of this load of waste.
- 2. The emergency response plan does not have the home addresses and phone numbers, as well as office numbers, listed for all individuals qualified to act as emergency coordinator. This is required by 40 CFR 265.52 (d).

A copy of the RCRA inspection report is enclosed for your review. Please respond by letter no later than November 21, 1983, documenting what actions have been taken to correct the items listed above. If you have any questions,

Mr. Sydney Blum Page 2

do not hesitate to call me at (313) 675-0860. I appreciate the cooperation you and your staff extended during the inspection and our follow-up meeting,

Sincerely,

Susan Norton

Susan Norton Water Quality Specialist Compliance Section Hazardous Waste Division

SN

Enclosure

cc: Hazardous Waste Division, Lansing (3)



1300 South Fort Street Detroit, Michigan 48217-1294 Telephone 313/843-9100

October 18, 1983

Ms. Susan Norton Michigan Department of Natural Resources 9311 Groh Road Grosse 11e, Michigan 48138

Dear Ms. Norton:

Attached is signed Chem-Met copy verifying disposal of 7,000 gallons of API separator sludge (Manifest #0161635) on August 12, 1983.

Sincerely yours,

Sydney Blum

Civic Affairs Coordinator

vh att.

RECEIVED

OCT 20 1983

WATER QUALITY DIV.

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1 11	endukora N	L thon	Petrole	um Co.	JPOI TO	Primary Transpo	nter's Name gre akes Wat	erbla	stino		11 0	Tre	hem-	Store-Me	ge o	Disp	vices		77	A STATE OF	36
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6.	nclude Safety	precautions a	and special hand	ling Instruction	18.				s. ',							1.	للنا		( ) ( A )	نتت	-
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I.S. E	ira I further c nation require	ertify that the ed by the man	n for transportati Information cont	ion according to tained on the ma a violation of 1	o the appli anifest is f	are properly class cable regulations actual. I understal and/or 1969 PA13	of the Departmen	t of Transp	ortation and	Gene	rator Si	gnatur	elec	4	7		- luo		MO.	Shipped DAY YEA	R
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astes	s. I also certify is the destina	that the wast	es were accompa on the manifest.	anled by a mani I understand the	fest prope at this mar	d wastes and tha rly certified by bo lifest can be used	h the generator a	nd hauler	and that this	30	Signa iy/Sig	10	D. A.Y.	13	19	7	Acce Reje		Date C	Received	3
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### RCRA Inspection Report

EPA Identification Number: 🚈 _	1 D 0 5 5 5	4
Installation Name: MARATNON	OIL COMPANY	· ·
Location Address: 1300 3007	FORT	
City: DETROIT	State: MICHIGAN	1 48217
Date of inspection: Sept. 26,1983	Time of inspection (fro	m) <u>8:30A.M</u> . (to) <u>//:25 P.M</u> .
Person(s) interviewed	Title CIVIC AFFAIRS	Telephone
MR. SYDNEY BLUM	COORDINATOL	313/843-9100
	· ·	
Inspector(s) SUSAN NORTON	Agency/Title micu. DNR/NAT WASTE DIV.	Telephone 3/3/675-0860
JAMES SCOTT	. 4 0 0 11 1	5/7/373-2750
Installation Activity (mark or	nly one box)	<pre>Inspection Form(s)</pre>
Treatment/Storage/Disposal Generation and/or Transport		A
Treatment/Storage/Disposal	(no generation or Transportat	ion) A
☐ Generation and Transportat	ion	В, С
■ Generation only		<b>B</b>
		Ç

FILED FOR THE FOLLOWING TYPES OF WASTE:

KONB-DAF FLOAT-GOES TO AP! SEP. — TO STUDGE

KON 9 - SLOPOIL EMULSION SOLIDS — OILS ARE RECOVERED, SOLIDS GO TO AP! REPARTOR

KOSO - NEAT EXCHANGEL BUNDLE CLEANING SLUDGE — TO AP! SEP — TO SLUDGE

KOSI - AP! SEPARATOR SLUDGE

KOSZ - TRNK BOTTOMS - REMOVED FROM TRNKS; TAKEN TO CHEM-MES

#### INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

		· · · · · · · · · · · · · · · · · · ·				
			Yes	No	NI*	Remarks
(1)	Doe. ava	s the generator have copies of the manifest ilable for review? 262.40	<u>&lt;</u>		<del> </del>	
(2)	mo n	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period. 7	inna ilano oranga ay			
(3)	fol cop	the manifest forms examined contain the lowing information? (If possible, make 262.2 ies of, or record information from, manifests t do not contain the critical elements)		a-domina-Tita are	- gar-pi-migraph (Things-Millige	
	ā.	Manifest document number?	X	· ·	<u> </u>	
	Ь.	Name, mailing address, telephone number, and EPA ID number of generator?	X	·	-	
	C.	Name and EPA ID number of transporter(s)?	X	D 100-0000		
	d.	Name, Address, and EPA ID Number of designate permitted facility and alternate facility?	ed <u>X</u>			
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X	ps. anniconstruction	ton \$-ray woodering	elle (1996) (Standball) – elle 1996 (Stangs en Parkerd land Standard en estatutes es estatutes
	f.	The total quantity of waste(s) and the type and number of containers loaded?	X	·	and Constructive-Market	
	g.	Required certification?	上			Reduktion to provide the second secon
	h.	Required signatures?	X	D ************************************		
(4)	Rep	ortable exceptions 262.42			GENE	ERATOR ZND COPY
	à.	For manifests examined in (2) (except for shi within the last 35 days), enter the number of fests for which the generator has NOT receive signed copy from the designated facility with days of the date of shipment.	COUL	D NOT BE LOCATED FOR 161635 - ALEO, NO WIT OF SEL. LISTED.		
:	b.	For manifests indicated in (4a), enter the nu which the generator has submitted exception r (40 CFR 262.42) to the Regional Administrator	repor	rts		

# Section C - PRE-TRANSPORT REQUIREMENTS (40 CFR Part 262 Subpart C)

			Yes	No	NI	Remarks
(1)	regulati	packaged in accordance with DOT ons? (Required prior to movement dous waste off-site) 262.30		appl Sumbl		TANK TRUCK
(2)	accordan hazardou	te packages marked and labeled in acceptations concerning acceptations concerning acceptation acceptat	262.31 ~ w	and	262.32	- NOT APPLICABLE
(3)	If requi	red, are placards available to ter? 262.33	X			
(4)	Pre-ship	oment Accumulation: / AFI SEPARATOR	– GRE	AT LA H	LES WAT	ERBLASTING LEAVES
a be.	ies only rmit. Th site.	to GENERATORS that store hazardous wanese items do not apply to generators	ste o	n-sit	e for	90 days or less without mmediately transported
		nazardous waste accumulated in con- ners? If no, skip to b. 262.34	×		+****	
	e e	Is each container clearly marked with the date on which the period of accumulation began?	<u>×</u>	жантын жасырда	- Na.	
	įį.	Have more than 90 days elapsed since the dates marked?		<u>×</u>	финисов изпысленирора	
	iii.	Is each container labeled or marked clearly with the words "Hazardous Wastes?"	X	eroccano.ess	Proceedings.	· · · · · · · · · · · · · · · · · · ·
	îv.	Are containers in good condition?	<u>Υ</u>	mr	VOICE PRODUCE IN COM.	yadd Mad 4-70/20 YESH ASSIS FERSING PARTS which mildly diff supragram, magazine yestag
	٧٠	Are containers compatible with waste in them?	X	b-m-compens	EP-OP-III	
	Vio	Are containers managed to prevent leaks?	X	<del>DOLy (A) - Sp</del>	*Hisconomic	
	vii.	Are containers stored closed?	X	See No.		n managa ga mana di sa mana managa da da kalifa - nya yang 200 kalifa kalifa da da da ya ya makilika kana da y
	viii.	Are containers inspected weekly for leaks and defects?	X	er nervenskelde		
	ix.	Are ignitable and reactive wastes sto at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	Ê			

C-1

Yes No NI Remarks

х.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	NOS INCOMPATIBLE WASTES
ΧŤ•	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	
	hazardous waste accumulated in tanks? no, skip to c. 262.34 (January 11, 1982	<u> </u>
i i.	revision) Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)	NOT AFFLICABLE
ii.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	
iii.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	
iv.	Do continuous feed systems have a waste-feed cutoff?	
V•	Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	
۷í.	Are required daily and weekly inspections done? 265.194	
vii.	Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198	
viii.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199	

Yes No NI Remarks

	THIS SECTION NOT APPLICABLE	res no ni Kemarks
ix.	Has the owner or operator observed buffer zone requirements for tanks	the National Fire Protection Association's containing ignitable or reactive wastes?
	Tank capacity:	gallons
	Tank diameter:	feet
	Distance of tank from property line	efeet
	(see tables 2-1 through 2-6 of NFPA Code - 1977" to determine complianc	A's "Flammable and Combustible Liquids ce.)
	hazardous waste accumulated in other an tanks or containers:	×
	rsonnel training. 262.34 (a) 5	SONNEL TERINING IS ALL-ENCOMPASSING FOR ALL
Do in	clude occur	ARDOUS MATERIALS NOT JUST WASTES. TRAINING IN E. WASTES IS A SPECIFIC UNIT, BUT MUCH APPROPRIATE TO WASTE WANDLING IS GIVEN IN OTHER UNITS.
j.	Job Titles?	X
ii.	Job Descriptions?	<u>×</u>
iii.	Description of training?	X
iv.	Records of training?	X
Vo	Did personnel receive the required training by 5-19-81?	X
٧i٠	Do new personnel receive required training within six months?	X ±
vii.	Do personnel training records indic that personnel have taken part in a annual review of initial training?	
e. Pr	eparedness and Prevention 265. Subp	part C
1.	Maintenance and Operation of Facility:	
	Is there any evidence of fire, expl release of hazardous waste or hazar waste constituent? 265.31	losion, or rdous X

		Yes	No NI	Remarks	8
ii.	If required, does this facility have the following equipment: 265.32		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
	Internal communications or alarm systems?	x			2
20 at 14	Telephone or 2-way Radios at the scene of operations?	X			9 5 5
*	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X		· · · · · · · · · · · · · · · · · · ·	<i>2</i> <sup>2</sup>
	Indicate the volume of water and/or foam	avai	ilable for	fire contro	ol:
	REFINERY IS FED BY 3 DIFF. WATER SUPP	121E5 -	- DETROIT DE	IRBORY FMEL	VINDALE -
	FOR FIRE CONTROL			the manufacture are only the control of the control	
iii.	Testing and Maintenance of Emergency Equipm	ent:	265.33		(AP)
	Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	Section and the section and th	4855 Secretaria de la compansa de la	
	Is emergency equipment maintained in operable condition?	X	watermine formation	We deliminate the Park Individual Consequence	
iv.	Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X_</u>			1
٧.	Is there adequate aisle space for unobstructed movement?	Χ_	-		2
vi.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u> </u>			
f. Cor	ntingency Plan and Emergency Procedures 265	Subp	oart D		
	Does the contingency plan contain the following information:	WAST	PCC DOES NO	THE COMPAN	14 NAS AN
	i. The actions facility personnel must tak to comply with §265.51 and 265.56 in reto fires, explosions, or any unplanned of hazardous waste? (If the owner has Prevention, Control and Countermeasures Plan, he needs only to amend that plan incorporate hazardous waste management provisions that are sufficient to compl with the requirements of this Part (as applicable.) 265.52	espons relea a Sp (SPO	se ase ill	NTROL PLAN THE EOLLOWIN	

Remarks

<b>ii.</b>	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	X	eminente de la constante de la	· · · · · · · · · · · · · · · · · · ·	<b>3</b> 13123-4		. Talkhiningaya	
į į į.	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	ROSES ROSES	X	t-onecosay.		оп тэ <b>э - С</b> үүчү (апаматан		
iv.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	X	\$E	ADDED	SHOVEL:	FOL	MATERIA SERVICE SERVIC	
٧.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	52.00 EVACA	68- AN NATTON TONS	VO OM ARBANG AT PLA	AN FOR E IS PROD BEMENTS INT ARE FIRE DEI	BABLY I FOR PA MANAG	NOT NEC	LESSAN ON
vi.	Are copies of the Contingency Plan availab at site and local emergency organizations?	le <u>X</u>		EPT, F	Y Y	EPT. E	SW MX	RNAGE
vii.	Is the facility emergency coordinator identified?	X		<del></del>	<del></del>			
iii.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>}</u>	<del>FORMAD-AND</del>		BATES-1400	- N/ - 1-82 (A-COM)	Cal-Marketo,	
ix.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	¥						

Yes No

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X. If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?

N/A - NO SUCH EMERGENCY HAS OCCURED

Secti	on D:	RECORDKEEPING AND REPORTING (Part 262,	Subpart	D)			
			Yes	No	NI	Remarks	
(1)	hazar	ll test results and analyses needed for dous waste determinations retained for ast three years? 262.40	<u>X</u>	toronomo.yga.			
Secti	on E:	INTERNATIONAL SHIPMENTS (Part 262 Subpa	rt E)				
(1)	Has t hazar	ne installation imported or exported dous waste? If "no", skip a and b.	Commission of the Control of the Con	X		-	
	a. E	xporting Hazardous Waste, has a generator	r: 100	- 11	PUCAL	SLE.	
	i	. Notified the Administrator in writing	?				_
	ii	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	w-w-w-gap	The Art of the Art of			
	jii.	Met the Manifest requirements?	on-wateroniciscolists				
	b. Is	nporting Hazardous Waste, has the enerator met the manifest requirements?		-	· · · · · · · · · · · · · · · · · · ·		
				,			